



*Local Telephone Services - Internet & Broadband - Long Distance
Security & Alarms - Data Center Services*

June 29, 2012

**BY ELECTRONIC COMMENT FILING SYSTEM AND
BY OVERNIGHT-FEDERAL EXPRESS**

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

And

BY E-MAIL (HCcerts@usac.org AND hcfilings@usac.org)

Ms. Karen Majcher
Vice President – High Cost Low Income Division
Universal Service Administrative Company
2000 L Street NW, Suite 200
Washington, D.C. 20036

Dear Ms. Dortch and Ms. Majcher:

Re: WC Docket No. 10-90 -
Annual Reporting and Certifications Required of Recipients of
High-Cost Support Pursuant to 47 C.F.R. § 54.313 (a)(2)
through (a)(6) and (h)
Due July 2, 2012

Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the rules and regulations of the Federal Communications Commission ("Commission"), 47 C.F.R. § 54.313(a)(2) through (a)(6) and (h), and Public Notice DA 12-729, released May 8, 2012, on behalf of Whidbey Telephone Company ("Company"), accompanying this letter for filing with the Commission and with the Universal Service Administrative Company ("USAC") is an original, of which is being filed both electronically and in hard copy, of the Company's annual reporting and certifications, due July 2, 2012, for service areas within Study Area 522452 for which the Company is a recipient of "high-cost support," as that term is defined in Section 54.5 of the Commission's rules and regulations, 47 C.F.R. § 54.5. The Company is a state-designated

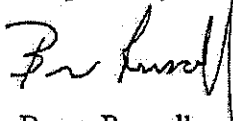
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eligible telecommunications carrier ("ETC") and, accordingly, the information contained in the reporting that accompanies this letter may be limited to information that the Company is required to collect pursuant to the rules of the state commission that has designated it as an ETC, the Washington Utilities and Transportation Commission ("WUTC").

This filing includes, in addition to this letter, the following documents, pursuant to Section 54.313 of the Commission's rules and regulations:

- (1) ANNUAL REPORTING OF WHIDBEY TELEPHONE COMPANY ("COMPANY") PURSUANT TO REPORTING REQUIREMENTS FOR RECIPIENTS OF HIGH-COST SUPPORT, AS SET FORTH IN SECTION 54.313(a)(2) THROUGH (a)(6) AND (h) OF THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATIONS COMMISSION, 47 C.F.R. § 54.313(a)(2) THROUGH (a)(6) AND (h); and
- (2) COMPLIANCE CERTIFICATION OF WHIDBEY TELEPHONE COMPANY PURSUANT TO SECTION 54.313(a)(5) AND (a)(6) OF THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATIONS COMMISSION, 47 C.F.R. § 54.313(a)(5) AND (a)(6).

Respectfully submitted,



Bruce Russell
Chief Operating Officer

Accompanying Documents:
Documents (1) and (2) identified above

cc: Washington Utilities and Transportation Commission

**ANNUAL REPORTING OF WHIDBEY TELEPHONE COMPANY ("COMPANY")
PURSUANT TO REPORTING REQUIREMENTS FOR RECIPIENTS OF HIGH-COST
SUPPORT, AS SET FORTH IN SECTION 54.313(a)(2) THROUGH (a)(6) AND (h) OF
THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATIONS
COMMISSION, 47 C.F.R. § 54.313(a)(2) THROUGH (6) AND (h)**

OUTAGE REPORTING – §54.313(a)(2)

Detailed information on any outage¹ in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) At least ten percent of the end users served in a designated service area; or (ii) A 911 special facility, as defined in 47 C.F.R. 4.5(e).

Company Report: During calendar year 2011, the Company did not experience any outage, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for any facilities it owns, operates, leases, or otherwise utilizes to provide any service for which it is a recipient of high-cost support, in any service area for which it is designated to be an eligible telecommunications carrier, that potentially affected (i) At least ten percent of the end users served in such service area; or (ii) A 911 special facility, as defined in 47 C.F.R. § 4.5(e).

UNFULFILLED SERVICE REQUESTS – §54.313(a)(3)

The number of requests for service² from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those customers.

Company Report: During calendar year 2011, the Company did not have any unfilled requests for service, as that term is understood by the Company to be used in 47 C.F.R. § 54.313(a)(3).

[continued on page 2]

¹ As used in §54.313(a)(2), the term "outage" is understood by the Company to refer outage of any service for which the Company is a recipient of high-cost support.

² As used in §54.313(a)(3), the term "service" is understood by the Company to refer to service for which the Company is a recipient of high-cost support.

NUMBER OF COMPLAINTS PER 1,000 CONNECTIONS – §54.313(a)(4)

The number of complaints³ per 1,000 connections (fixed or mobile)⁴ in the prior calendar year.

Company Report: During calendar year 2011, the Company received notice of 0.6327 complaints (as that term is understood by the Company to be used in 47 C.F.R. § 54.313(a)(4)) per 1,000 connections (as that term is understood by the Company to be used in 47 C.F.R. § 54.313(a)(4)).

ADDITIONAL VOICE RATE DATA – §54.313(h)

All incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state fees as defined pursuant to §54.318(e) of this subpart, to the extent the sum of those rates and fees are below the rate floor as defined in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

Company Report: As of June 1, 2012, the Company had the following rates for residential local service, as well as any applicable state fees as defined pursuant to §54.318(e), the sum of which, as of June 1, 2012, were below the local urban rate floor as defined in §54.318:

Description of Service	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory EAS Charge	Number of Lines
Exchange Service - All service areas	\$9.40	N/A	N/A	N/A	8,258

Dated: June 29, 2012

WHIDBEY TELEPHONE COMPANY

³ As used in §54.313(a)(4), the term "complaints" is understood by the Company to refer to complaints filed with any governmental agency of which the Company has received notice and that pertain to service for which the Company is a recipient of high-cost support.

⁴ As used in § 54.313(a)(4) and applied to a local exchange carrier ("LEC") that is a recipient of high-cost support, the term "connections" is understood by the Company to refer to working access lines to which the LEC provides local exchange service and for which the Company is a recipient of high-cost support.

**COMPLIANCE CERTIFICATION OF WHIDBEY TELEPHONE
COMPANY PURSUANT TO SECTION 54.313(a)(5) AND (a)(6) OF THE
RULES AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION, 47 C.F.R. § 54.313(a)(5) AND (a)(6)**

I, Bruce Russell, being of lawful age, state that I am Chief Operating Officer of Whidbey Telephone Company, that I am authorized to execute this certification on behalf of Whidbey Telephone Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

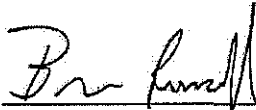
On that basis and in that capacity, I certify the following:

SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES – §54.313(a)(5) – that, with respect to services for which Whidbey Telephone Company receives high-cost support,⁵ Whidbey Telephone Company is complying with applicable service quality standards and applicable consumer protection rules; and

EMERGENCY SITUATIONS – §54.313(a)(6) – that, with respect to services for which Whidbey Telephone Company receives high-cost support, Whidbey Telephone Company is able to function in emergency situations as set forth in § 54.202(a)(2) of the rules and regulations of the Federal Communications Commission, 47 C.F.R. § 54.202(a)(2).

Date: June 29, 2012.

WHIDBEY TELEPHONE COMPANY

By 
Bruce Russell
Its: Chief Operating Officer

⁵ As used in this certification, "high-cost support" refers to "high-cost support," as defined in Section 54.5 of the rules and regulations of the Federal Communications Commission, 47 C.F.R. § 54.5.